

ROBERT WISNIEWSKI P.C.  
ATTORNEYS-AT-LAW

17 STATE STREET, SUITE 820 • NEW YORK, NY 10004  
TEL: (212) 267-2101 • WEB: [www.rwapc.com](http://www.rwapc.com)

August 14, 2023

Hon. Sidney H. Stein, USDJ  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007  
*VIA ECF*

**MEMO ENDORSED**

**Re: Rosario et al v. 2022 Eastchester LLC et al**  
**Docket No.: 20-cv-09182 (SHS)**

Dear Judge Stein,

I represent Plaintiffs in the above-referenced case. I submit this letter motion to request an extension of time to file a motion for default judgment from today to Friday, August 18, 2023. There is no prejudice to any party and this is the first request of this kind.

I apologize for the last minute filing. I intended to file the motion today and have it almost ready but owing to circumstances beyond my control, I was unable to meet with one of the clients to obtain additional documents necessary for the motion Friday or today. Since last week, I had to devote a lot of time to a ferocious discovery dispute in another case pending in the SDNY which culminated in today's hearing in White Plains today. I returned from court too late for Mr. Camara to come over today. I spoke to him and we had to reschedule our meeting for the morning of Thursday, August 17. Once my office has the documents and additional information, I will just need several hours to finish up the motion documents. I am confident that I will be able to file the motion on Friday, August 18, 2023.

For the foregoing reasons, Plaintiffs request an extension of time to file a motion for default against the defaulting defendants until Friday, August 18, 2023.

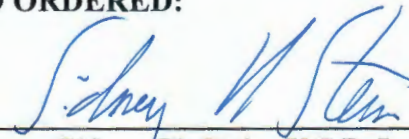
Respectfully submitted,

/s/Robert Wisniewski  
Robert Wisniewski

**Plaintiffs' request for an extension of time to file a motion for default judgment from today until August 18, 2023, is granted.**

**Dated: New York, New York**  
**August 15, 2023**

**SO ORDERED:**

  
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Sidney H. Stein, U.S.D.J.